

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MICHAEL PHILIP KAUFMAN,

Plaintiff,

v.

Civil Action No.:
1:16-cv-02880-AKH

MICROSOFT CORPORATION,

Defendant.

PLAINTIFF'S NOTICE OF MOTION TO FILE UNDER SEAL

PLEASE TAKE NOTICE that plaintiff Michael Philip Kaufman ("Plaintiff" or "Kaufman"), by his undersigned attorneys, respectfully moves this Court at a date and time to be set by the Court, for an order permitting Plaintiff to file under seal unredacted versions of the following documents:

- 1) Memorandum of Law in Support of Plaintiff's Motion to Exclude Expert Testimony of Dr. Jeffery Stec Regarding Litigation Settlement; and
- 2) Exhibits A and B of the Declaration of Ronald Abramson in Support of Plaintiff's Motion to Exclude Expert Testimony of Dr. Jeffery Stec Regarding Litigation Settlement and Exhibits attached thereto.

This motion is based on the accompanying Memorandum of Law in Support of Plaintiff's Motion to File Under Seal and Declaration of Ronald Abramson. A proposed order is attached hereto. As detailed in the accompanying memorandum of law, these documents contain confidential information of Defendant Microsoft Corporation that has asserted should be filed under seal.

Dated: October 23, 2019

Respectfully submitted,

/s/ Ronald Abramson

Ronald Abramson

Tel: (212) 257-1643

Email: ron.abramson@listonabramson.com

David G. Liston

Ari J. Jaffess

Alex G. Patchen

LISTON ABRAMSON LLP

The Chrysler Building

405 Lexington Avenue, 46th Floor

New York, New York 10174

Attorneys for Plaintiff

Michael Philip Kaufman

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 23rd day of October, 2019, a true and correct copy of the foregoing document entitled PLAINTIFF'S NOTICE OF MOTION TO FILE UNDER SEAL was electronically filed with the Clerk of the Court using the CM/ECF system, which constitutes service to all attorneys of record, pursuant to L. Civ. R. 5.2(a).

/s/ Ronald Abramson
Ronald Abramson